

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

LEAD EXPRESS, INC., et al.,

Defendants.

Case No. 2:20-cv-00840-JAD-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
ANSWER
(First Request)**

ECF No. 39

Pursuant to Local Rule IA 6-1, the FTC and Defendants, by and through their undersigned counsel, hereby stipulate and agree to extend the time for Defendants to answer or otherwise respond to the complaint in this action ("Complaint). This is the first stipulation for extension of time to file responsive pleadings. In support thereof, the parties state:

1. With the exception of Defendant Naito who currently is in Japan, Defendants were served with a summons and Complaint on either May 19, 2020 or May 21, 2020. (*See* ECF Nos. 18-27.) Accordingly, responsive pleadings were due on June 11, 2020.
2. The parties stipulate and agree that good cause exists to extend the time within which to file responsive pleadings, and that the parties are acting in good faith. In particular, the parties stated that upon service of the summonses and Complaint, the parties were engaged in extensive efforts to reach an agreement on stipulated preliminary injunctions, which consumed their time and focus. Agreements were reached on June 12, 2020, and the parties filed those stipulated preliminary injunctions with the Court on that same day. (*See* ECF Nos. 34-37.)
3. This is the first request to extend time to file responsive pleadings is made in good faith and not for the purpose of delay.

4. Now, Defendants seek a 45-day extension from June 9 in which to file responsive pleadings. The FTC stipulates to this extension.
5. Therefore, the parties stipulate and agree that Defendants shall have until July 24, 2020 to answer or otherwise respond to the Complaint.
6. This agreement shall be without prejudice to any party.

IT IS SO STIPULATED.

/s/Gregory A. Ashe

GREGORY A. ASHE
HELEN CLARK
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20850
Telephone: 202-326-3719 (Ashe)
Telephone: 202-326-3373 (Clark)
Facsimile: 202-326-3768
Email: gashe@ftc.gov; hclark@ftc.gov

NICHOLAS A. TRUTANICH
United States Attorney
LINDSAY AGER
Assistant United States Attorney
Nevada Bar No. 11985
333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Facsimile: (702) 388-6787

Attorneys for Plaintiff Federal Trade Commission

/s/ M. Migali Mercera

M. MIGALI MERCERA (Nev. Bar #11742)
Pisanelli Bice PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
Telephone: 702-214-2100
Facsimile: 702-214-2101
E-mail: mmm@pisanellibice.com

DAVID N. ANTHONY (*pro hac vice* forthcoming)
MICHAEL E. LACY (*pro hac vice* forthcoming)
TIMOTHY A. BUTLER (*pro hac vice* forthcoming)
RYAN J. STRASSER (*pro hac vice* forthcoming)
Troutman Sanders
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 303008
Telephone: 804-697-5410 (Anthony)
Telephone: 804-697-1326 (Lacy)
Telephone: 404-885-3697 (Butler)
Telephone: 804-697-1478 (Strasser)
Email: david.anthony@troutman.com,
Michael.lacy@troutman.com,
timothy.butler@troutman.com,
ryan.strasser@troutman.com

*Attorneys for Defendants Lead Express, Inc.,
Camel Coins, Inc., Sea Mirror, Inc., Naito
Corp., Kotobuki Marketing, Inc., Ebisu
Marketing, Inc., Hotei Marketing, Inc.,*

*Daikoku Marketing, Inc., Takehisa Naito, and
Keishi Ikeda*

/s/Justin Gray (by permission)

JUSTIN GRAY
Rosette, LLP
44 Grandville Avenue SW, Suite 300
Grand Rapids, MI 49503
Telephone: 616-655-1601
Email: jgray@rosettela.com

*Attorney for Defendant La Posta Tribal
Lending Enterprise*

**Based on the parties' stipulation [39] and good cause appearing, IT IS HEREBY ORDERED
that the defendants' deadline to answer or otherwise respond to the complaint is extended to
July 24, 2020.**


JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

Dated: 6-16-2020